

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

LeMond Cycling, Inc.,

Plaintiff,

v.

Trek Bicycle Corporation,

Defendant/Third-Party
Plaintiff,

v.

Greg LeMond,

Third-Party Defendant.

Civil No. 08-1010 (RHK-JSM)

Judge Richard H. Kyle
Magistrate Judge Janie S. Mayeron

Date: February 17, 2009
Time: 11:00 a.m.
Judge: Janie S. Mayeron

**PLAINTIFF'S MOTION FOR ENTRY OF A PROTECTIVE ORDER
REGARDING DEFENDANT'S THIRD-PARTY SUBPOENAS**

Plaintiff LeMond Cycling, Inc., and Third-Party Defendant Greg LeMond (collectively "Plaintiff"), by and through their attorneys, respectfully moves the Court for entry of an Order under Federal Rule of Civil Procedure 26 for entry of a Protective Order regarding Defendant Trek Bicycle Corporation's third-party subpoenas issued to J.P. Pascal, The Gluskin Townley Group LLC, and Maslon, Edelman, Borman & Brand LLP.

Pursuant to Federal Rule of Civil Procedure 26 and Local Rule 37.1, Plaintiff certifies that it has attempted, without success, to resolve this discovery

dispute through a face to face meeting on January 5, 2009. Plaintiff will continue to work with opposing counsel to resolve this discovery dispute before the scheduled hearing date of February 17, 2009.

In support of this motion, Plaintiff will file its Memorandum of Law in Support of its Motion for Entry of a Protective Order Regarding Defendant's Third-Party Subpoenas, in compliance with Local Rule 7.1(a), no later than February 3, 2009.

Dated: January 9, 2009

ROBINS, KAPLAN, MILLER & CIRESI L.L.P

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